

Constructing a Child Protection Policy to Support a Safeguarding Children Culture in Organisations and Institutions

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Thousands of hours of evidence of trauma, pain and culpability presented to the current Royal Commission into Institutional Responses to Child Sexual Abuse have left no doubt that organisations have always been and continue to be responsible for enacting a culture that ensures that their own staff and volunteers do not harm, abuse or exploit children who are involved directly or indirectly with the activities or services provided by the organisation. In the past 6 years, through its Safeguarding Children Accreditation Program, the Australian Childhood Foundation has worked with more than 100 organisations nationally and internationally to strengthen their capacity to protect children and young people. Our experience has highlighted that substantial confusion exists about how to construct a child protection policy that frames the expectations and responsibilities of individuals who work, volunteer or use the services/activities of an organisation. In this paper, the authors offer a blueprint for considering the critical elements of a child protection policy that organisations can use to evaluate and possibly reconfigure or formulate their own. The paper outlines the function of the child protection policy in an organisation; the principles for constructing the policy; and an example of content for a child protection policy. The authors conclude that, if constructed with heart and sensitivity, a child protection policy can shape and define the very narrative about what the organisation stands for in relation to the safety of children and the responsibilities of adults to fulfilling the rights of children and young people more broadly.

■ **Keywords:** Child protection, safeguarding children, organisational abuse, inquiries, child safe culture

Introduction

Both the 2013 Victorian Parliamentary Inquiry into the Handling of Child Abuse by Religious and Other Organisations and the current Royal Commission into Institutional Responses to Child Sexual Abuse have highlighted the scope of responsibilities that organisations have in relation to the protection of children.

Thousands of hours of evidence of trauma, pain and culpability have left no doubt that organisations have always been and continue to be responsible for enacting a culture that ensures that their own staff and volunteers do not harm, abuse or exploit children who are involved directly or indirectly with the activities or services provided by the organisation.

Organisations have always been and continue to be responsible for responding effectively, ethically and legally to both the abuse and exploitation of children that is perpetrated by their staff and volunteers, and the abuse and exploitation of children that is perpetrated by others in the

community and is identified by staff and volunteers in the course of their work.

In the past 6 years, through its Safeguarding Children Accreditation Program, the Australian Childhood Foundation has worked with more than 100 organisations nationally and internationally to strengthen and externally review their organisational capacity to protect children from harm, abuse and exploitation. It has included lifestyle and recreation organisations, international aid organisations responsible for the support and placement of volunteers, sporting bodies, religious institutions, and child and family welfare organisations.

Our experience has highlighted that substantial confusion exists about how to construct a child protection policy

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that frames the expectations and responsibilities of individuals who work, volunteer or use the services/activities of an organisation.

This insight is echoed by many Australian inquiries that have investigated the abuse of children by adults who work or volunteer with them, finding an absence of adequate child protection policies and procedures (Irenyi, Bromfield, Beyer, & Higgins, 2007). Areas identified as problematic included the recruitment and selection of staff; responding to allegations of abuse; reporting of abuse; procedural transparency and accountability; record keeping; and child protection education and training (Australian Senate Community Affairs References Committee, 2004, 2009; Cummins, Scott, & Scales, 2012; Family and Community Development Committee, 2013; Ford, 2007; Forde, 1999; Mullighan, 2008; Wood, 1997). Most recently, the First Interim Report by the Royal Commission into Institutional Responses to Child Sexual Abuse (June, 2014) has pointed to the need for clear organisational policies and practices as foundational to a protective culture for children.

In this paper, the authors offer a blueprint for considering the critical elements of a child protection policy that organisations can use to evaluate and possibly reconfigure or formulate their own. The paper outlines:

- the function of the child protection policy in an organisation;
- the principles for constructing the policy; and
- an example of content for a child protection policy.

What is the Function of an Organisation's Child Protection Policy?

A child protection policy performs several important functions in organisations. It is one of a primary set of documents which embody the commitment that an organisation makes to the safety and welfare of children and young people. It also sets the tone about how seriously the organisation regards this commitment.

An organisation's child protection policy, first and foremost, codifies a set of expectations for staff, volunteer and service-user behaviour. It is comprised of unambiguous and simple to understand statements that all individuals in the organisation can interpret for themselves. It should support the confidence of individuals to know how to align themselves to the commitment to children and young people that the organisation has made on their behalf.

It defines the scope of the areas of the organisation that it will seek to influence in order to support the evolution of a child-safe culture. This function is important but not always understood. A child protection policy both:

- (a) *integrates* with other policies that the organisation has implemented; **and**
- (b) *serves to integrate* the outcomes of these different policies with specific regard to the impact that they have

collectively in protecting children and young people from harm, abuse and exploitation arising from their involvement with the organisation.

While each organisation is different, and each structures its suite of organisational policies uniquely, it is our experience that an effective child protection policy draws on and shapes the intent and objectives of a range of other policies and/or organisational codes, including but not limited to:

- code of conduct;
- code of ethics;
- Working with Children Check and Criminal Records Check policy;
- screening and pre-employment policy;
- induction policy;
- volunteer policy;
- confidentiality policy;
- social media policy;
- contact with children/young people policy;
- quality assurance and improvement policy;
- responding to complaints from service users policy;
- responding to complaints from professionals policy;
- supervision policy;
- professional development policy;
- whistleblower protection policy;
- responding to allegations of abuse and exploitation policy.

This list is by no means exhaustive. However, it demonstrates how the scope of a child protection policy needs to be contextualised within a broader understanding of everything that an organisation does and means to do. Importantly, an organisation's child protection policy serves to interpret how the relevant sections of each of these related policies connect with the organisation's commitment to protect children and young people from harm, abuse and exploitation.

A child protection policy should also clarify the knowledge and resources that an organisation will provide to its staff, volunteers and service users in order for its commitments to be fulfilled. It sets out the framework that connects the understanding and attitudes of individuals to the broader system of evidence and principles that the organisation uses to undertake its programmes and services in achieving its mission.

An effective child protection policy is instrumental in guiding the decision making of individuals within the organisation. It restricts the area of search for possible responses to issues of concern and risk that arise in the context of providing activities and programmes to children and young people. Consequently, a child protection policy promotes efficiency, predictability and consistency. It also enables the delegation of responses to individuals at different

levels within the structure of the organisation, specifying clearly their roles and the limits of their authority. It also acts to establish the need for a series of procedures that operationalises and enables the policy to be implemented in a meaningful and deliberate way.

Finally, a child protection policy embeds a commitment by the organisation to evaluate its effectiveness and to establish quality improvement cycles to ensure that it is kept alive within the organisation, shaping and reshaping the culture over time.

What are the Principles for Constructing a Child Protection Policy?

The endorsement and take up of a child protection policy is predicated on a number of factors and dynamics that can be traced to the way in which it was constructed and written. In this section, we offer the insights that we have gleaned through our work with organisations in supporting them to revitalise, if not develop, their child protection policy for the first time.

Principle 1. Use Language that is Relevant to the Organisation, its People and its Mission

An organisational child protection policy should speak in the language of the organisation and reflect its values. The wording of the policy plays an important role in generating commitment to its implementation. It is a mirror to the organisation's mission and identity. It will be real when it is experienced as a genuine feature of the organisation's character instead of an 'add on' to it.

For these reasons, there are inherent dangers for organisations in developing child protection policies that use a 'cookie-cutter' template. Too often, these versions of policies dilute their intent as they are cloned further and further away from the original source.

Principle 2. Differentiate the Different Groups to which the Policy Applies

The policy should clearly differentiate between expectations for employees and volunteers as one group and the entitlements and expectations of children, young people and adults who are service users as another group. A child protection policy which fails to differentiate who is the target of what set of obligations increases the risk of confusing the strength of the message that is delivered about its commitments.

Principle 3. Distinguish between Abuse that is Perpetrated by Employees and Volunteers of the Organisation and Abuse that Occurs by Others in the Community and is Identified by Employees and Volunteers of the Organisation

In our experience, many organisations have child protection policies that conflate the issue of child abuse perpetrated within organisations by staff or volunteers with the suspected abuse of a child or young person by his/her parents or someone else in the community.

It is important to recognise that there are very different decisions that flow from the abuse or exploitation of a child or young person by the staff and volunteers of an organisation (organisational child abuse) and the abuse or exploitation perpetrated against children by parents or others in the community (community child abuse) and identified by staff or volunteers of the organisation.

In the context of organisational child abuse, the organisation itself is a focus of the investigation. It must proceed with transparency and a commitment to ensuring that its staff or volunteers who are responsible for the abuse or exploitation are held accountable for their behaviour. The organisation's management must act lawfully and ethically at all times. It must co-operate with any external investigation of the incident and should undertake an internal review of the circumstances that led to the situation occurring. It must also provide resources for supporting children, young people and their families who are in any way affected by the abuse or exploitation. The focus of the organisation's efforts is on achieving justice, protection and support for the children and young people affected by the abuse and exploitation. The organisation also has a responsibility to other staff or volunteers who may be adversely impacted by the allegations about, or incidence of, abuse or exploitation of a child or young person by a colleague.

In the context of community child abuse, the organisation is not an implicated party in the abuse or exploitation of the child or young person. If staff or volunteers become concerned that a child or young person accessing their programmes has been or is at risk of abuse or exploitation by a family or community member, the role of the organisation is to act to ensure that relevant information about the risks to the child or young person is reported to the appropriate authorities in a timely way. Its staff and volunteers need to be supported through any difficulties in managing the reporting process, as well as involvement in subsequent actions that may be taken by relevant child protection authorities or police. The primary responsibility of the organisation is to be an active member of the protective network around the child or young person.

The policy should clearly define and differentiate organisational child abuse from community child abuse and clearly explain the organisational processes and critical decision-making pathways that relate to the detection or suspicion of each form of child abuse or exploitation.

Principle 4. Involve Different Levels of the Organisation in Constructing what the Policy Should Cover and its Details

Sharing the responsibility for developing a child protection policy serves to maximise its effectiveness. Collective identification of the areas of risk facing children and young people arising from their participation in an organisation supports the undertaking of a comprehensive analysis. It allows for shared problem solving with a greater likelihood that the different levels of staff within the organisation's hierarchy will

be engaged to implement strategies for addressing the risk. Ownership of the child protection policy will be achieved if it is led by the leadership of the organisation and inclusive of a range of staff and volunteers.

Principle 5. Ensure that the Policy Contains a Clear Code of Conduct to which all Staff and Volunteers must Comply, Regardless of their Role or Contact with Children and Young People

The policy should contain a clear code of conduct that is applied to all staff and volunteers, regardless of whether their primary role is involved with children or they have only incidental contact with children and young people as part of their role. Children and young people can be services users in their own right, can accompany adults accessing services, or can be visitors to the service. Staff or volunteers in ancillary roles, administration roles, Board Director roles, or whose work may focus on adults can all come into contact with children. The obligations of these staff and volunteers to the safety of children are the same as those of staff whose primary role is to work or volunteer with children. A clear code of conduct that applies to all staff reflects the strength of the organisation's commitment to a strong safeguarding culture.

Principle 6. Ensure that the Policy is Clear that Staff and Volunteers are Governed by it Whether they are at Work or not at Work

This is an important principle that in our experience is often not made clear enough in the construction of child protection policies. The obligations to act protectively towards children transcend work and personal spheres. For example, staff and volunteers who abuse or exploit children in other settings pose a risk to all children and therefore their employment or voluntary role with the organisation cannot continue. Equally, information about the risk another staff or volunteer poses to children and young people, which a staff member or volunteer may gain access to away from work, falls into the scope of this policy.

Principle 7. Seek and Integrate the Input of Children and Young People into the Development of Services and the Policies that Relate to Them

A critical principle underpinning any policy, service or programme that relates to children and young people must be the commitment to seek the views of, and feedback from, the children and young people to whom you are assuming a responsibility. This can be a challenging aspect of policy development and service feedback for many organisations. However, in respecting the rights of children and young people to have a voice about the shape and delivery of the services they are involved in, organisations must establish mechanisms for seeking the input of children into the development and evaluation of services and the policies that relate to them. In our experience, if an organisation establishes a culture where children's voices are heard and their opinions are sought regularly, it is far easier for chil-

dren and young people to speak up when they are worried or feel unsafe.

Principle 8. Organise for the Policy to be Externally Reviewed

It is critical that once the policy is completed it is reviewed by at least one other person external to the organisation. This will ensure that any inconsistencies or gaps are identified and addressed. Child protection is a specialist area of knowledge. It is helpful to seek feedback from an individual or group who have experience in child protection and organisational management. Organisations cannot know what they do not know. Access to external review will offer a different perspective that can be very important in ensuring that the policy is as clear and as comprehensive as it can be.

What is Example Content for a Child Protection Policy?

In this section, we propose an example of the way that a Child Protection Policy can be constructed and written. It uses the preceding analysis to suggest a form of words that meets the intent and function of an organisational child protection policy. It is not meant to be used as a template, but rather an example of the content that we have found important in establishing an effective, child-safe organisational culture.

Section 1. Why do We Believe that We Should Keep Children and Young People Safe from Abuse and Exploitation?

Our organisation believes in the dignity and right of each child and young person to safe and trusting relationships.

We are committed to the safety and wellbeing of all children and young people. We support the rights of children and young people as outlined in the United National Convention on the Rights of the Child. We will act without hesitation to ensure that a child or young person is safe and protected.

It is an intrinsic part of the fabric of the organisation to promote the positive development of all children and young people who access its programmes and services.

We will work to ensure that our organisation's environment and culture provides a safe place for children and young people at all times.

To this end, all our staff and volunteers will always act in the best interests of children and young people and take all reasonable steps to ensure children's safety.

Section 2. What Definitions of Child Abuse do we use in our Policy?

Emotional or psychological abuse. Emotional or psychological abuse occurs when a child or young person does not receive the love, affection or attention he or she needs for healthy emotional, psychological and social development. Such abuse may involve repeated rejection or threats to a child or young person. Constant criticism, teasing, ignoring, threatening, yelling, scapegoating, ridicule, and

rejection or continual coldness are all examples of emotional abuse. These behaviours continue to an extent that results in significant damage to the child or young person's physical, intellectual or emotional wellbeing and development.

Physical abuse. Physical abuse occurs when a person subjects a child or young person to non-accidental physically aggressive acts. The perpetrator may inflict an injury intentionally, or inadvertently as a result of physical punishment or the aggressive treatment of a child. Physically abusive behaviour includes (but is not limited to) shoving, hitting, slapping, shaking, throwing, punching, biting, burning and kicking. It also includes giving children or young people harmful substances, such as drugs, alcohol or poison. Certain types of punishment, while not causing injury, can also be considered physical abuse if they place a child or young person at risk of being hurt.

Sexual abuse. Sexual abuse occurs when an adult involves a child or young person in any sexual activity. Sexual abuse can also occur by a child or young person to another child or young person. Perpetrators of sexual abuse take advantage of their power, authority or position over the child or young person for their own benefit. Sexual abuse can include making sexual comments to a child or young person, engaging children or young people to participate in sexual conversations over the internet or on social media, kissing, touching a child's or young person's genitals or breasts, oral sex or intercourse. Encouraging a child or young person to view pornographic magazines, websites and videos is also sexual abuse.

Grooming. Grooming is a term used to describe what happens when a perpetrator builds a relationship with a child or young person with a view to sexually abusing them at some stage. There is no set pattern in relation to the grooming of children. For some perpetrators, there will be a lengthy period of time before the abuse begins. Other perpetrators may draw a child in and abuse them relatively quickly. Some abusers do not groom children but abuse them without forming a relationship at all. Grooming can take place in any setting where a relationship is formed, such as leisure, music, sports and religious activities, or through electronic forms of communication, including social media.

Forced to live with family violence. Being forced to live with family violence is a specific form of emotional and psychological abuse. It occurs when children or young people are exposed to, witness or experience the aftermath of violence between adults in their home. It is harmful to children and young people. Family violence is defined as violence between members of a family or extended family or those fulfilling the role of family in a child's or young person's life. Being forced to live with family violence places children and young people at increased risk of physical injury and harm, and has a significant impact on their wellbeing and development.

Exploitation. Exploitation occurs when children or young people are forced into sexual activities for the benefit of an adult or a group of adults, including commercial profit. It can include a child or young person being forced into sexual activity which is then recorded in some way and/or used to produce pornography. Such pornography can be in the form of actual photos or videos or published on the internet. Exploitation can also involve children or young people who are forced into prostitution.

Harm. Harm, to a child or young person, is any detrimental effect of a significant nature on the child's or young person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by:

- physical, psychological or emotional abuse or neglect; or
- sexual abuse or exploitation;
- a single act, omission or circumstance; or
- a series or combination of acts, omissions or circumstances.

Bullying. Bullying involves the inappropriate use of power by one or more persons over another less powerful person or group, and is generally an act that is repeated over time. Bullying can take many forms, which are often interrelated and include:

- verbal (name calling, put downs, threats)
- physical (hitting, punching, kicking, scratching, tripping, spitting)
- social (ignoring, excluding, ostracising, alienating)
- psychological (spreading rumours, stalking, dirty looks, hiding or damaging possessions)

Section 3. What are our Commitments under our Child Protection Policy?

Our commitment to children and young people:

We are committed to the safety and wellbeing of all children and young people who access any of our programmes, services or facilities.

We are committed to providing children and young people with positive and nurturing experiences.

We will support families and communities to promote children's and young people's healthy development and wellbeing.

We will take action to ensure that children and young people are protected from abuse, family violence and neglect.

We will take action to ensure that children and young people are not exploited, abused or harmed during the time that they are involved with any of our programmes, services or facilities.

We will listen to children and address any concerns that they raise with us.

Our commitment to parents and carers:

We are committed to supporting parents and carers to protect their children.

We will offer assistance that builds on a family's strengths, is sensitive to their cultural and religious beliefs, and empowers them to meet the changing needs of their children.

We are committed to communicating honestly and openly with parents and carers about the wellbeing and safety of their children.

We aim to be transparent in our decision making with parents and carers, as long as doing so does not compromise the safety of children or young people.

Our commitment to our staff and volunteers:

We are committed to providing all staff and volunteers with the necessary support to enable them to fulfil their roles.

We will have in place a management structure that supports and develops staff and volunteers in their roles.

We are committed to providing staff and volunteers with regular supervision and development opportunities.

We will work to ensure that staff and volunteers have access to a senior person to make decisions in relation to any action required to protect children and young people from abuse, bullying and exploitation.

We will work to ensure that there are safeguards in place to protect staff and volunteers from violence or any kind of harassment in their workplace.

We will have in place protection for staff and volunteers who report concerns about other staff or volunteers using the operational procedures of the organisations. Staff will never be adversely affected in their job if they report what they believe to be the truth.

Our commitment to ensuring a child-safe organisation:

We are committed to using best practice standards in the recruitment, screening and employment of staff and volunteers.

We will work to create an environment in which children and young people are safe and feel safe.

We will work to ensure that our staff and volunteers do not harm, abuse or exploit children and young people who are involved with, access or visit our programmes, services or facilities.

Section 4. What do we Expect from our Staff and Volunteers?

We expect our staff and volunteers to understand children's rights. An understanding of children's rights is an important basis for all the programmes and services that we offer to children and families. It enables us to identify when children's needs and entitlements are compromised and when they require support. We expect our staff and volunteers to have a working knowledge of children's rights appropriate to their role, and to use it to inform decisions about how to behave and act with, and on behalf of, children and young people.

We expect our staff and volunteers to have a commitment to knowledge. We expect our staff and volunteers to know and be willing to learn about child development, child abuse and child protection. We expect our staff and volunteers to have a working knowledge of these topics appropriate to their role and to use it to inform decisions about planning, resources and action.

We expect our staff and volunteers to understand and acknowledge the significance of family relationships for children and young people. Children's and young people's experiences of their family are foundational for their development. Families can act as supportive resources for growth and resilience in children and young people. Family relationships can also restrain and harm children's social, physical, cognitive and emotional functioning. Families are the single most significant influence in shaping the way children and young people develop and perceive their sense of identity. We expect our staff and volunteers to recognise, respect and work to strengthen the capacities of parents/carers and other family members to care and protect their children.

We expect our staff and volunteers to promote and distribute information about this policy to children, young people and parents/carers. The information will be made available in developmentally appropriate language so that children and young people can understand it. We will also have it translated to accommodate children, young people and families from culturally and linguistically diverse backgrounds. Where necessary, this information will also be available in other formats to address literacy and other needs.

We expect our staff and volunteers to respect the cultural and religious practices of families who access our services. We recognise the importance of culture and religion in the lives of children, young people and families. We expect our staff and volunteers to act in ways that are inclusive and respectful of the cultural and religious practices of families who access our services. However, no cultural or religious belief will take precedence over the right of children for protection from harm.

We expect our staff and volunteers to understand and respond to the special needs of children and young people with developmental delays or disabilities. We acknowledge that children and young people with developmental delays or disabilities have special needs. We expect our staff and volunteers to act in ways that communicate effectively with and are supportive of children and young people with developmental delays or disabilities. We also understand that we will need to be proactive in recognising the additional vulnerability to exploitation and harm that children and young people with developmental delays or disabilities experience.

We expect our staff and volunteers to be respectful of children and young people. As part of our commitment to children and young people, we will facilitate opportunities for children and young people to tell us their views and feedback

about the services we provide for them. We will treat children and young people as individuals and respect their unique abilities and vulnerabilities. We expect our staff and volunteers to express attitudes and engage in behaviour that respect and support children and young people.

We expect our staff and volunteers to protect the privacy of children, young people and families. We have a comprehensive privacy policy. We expect our staff and volunteers to protect the privacy of children, young people and families. At the beginning of their involvement with our services, we will provide children, young people and their parents/carers with information that details this policy and its implications. The information will be made available in developmentally appropriate language and translated to accommodate the languages of the major cultural diversity of the communities that access our services.

We will ask for consent from children, young people and their parents/carers before we seek out or provide information about them to any other individuals or organisations. However, we may not ask for consent to disclose information to the police, regulatory authority or statutory child protection agency in the event that we have concerns about the safety and wellbeing of a specific child or young person.

We expect our staff and volunteers to always follow our code of conduct. We have a written code of conduct that sets out rules for behaviour with and around children and young people. All staff and volunteers will be asked to personally endorse a code of conduct and to ensure that they adhere to it when they are at work and away from work. It aims to ensure that our staff and volunteers are always safe adults who act protectively of children and young people.

We expect our staff and volunteers to act on any concerns raised by children, young people and/or their parents/carers. We will take seriously any concerns or issues raised by children, young people and/or their parents. We will investigate all complaints or allegations made against any of our staff or volunteers. We will ensure that we report any crimes against children, young people or other family members to the police in accordance with the policies and operational procedures of the organisation. We expect our staff and volunteers to follow our complaints procedure without hesitation in response to concerns raised by children, young people and/or their parents.

We expect our staff and volunteers to understand the definitions, indicators and impact of child abuse, bullying and exploitation. Experiences of abuse (physical, sexual, emotional), grooming, family violence, neglect, bullying and exploitation are significant sources of trauma for children and young people, and intensify the risk of children and young people developing a range of emotional, psychological, social and behavioural problems. Many aspects of these forms of harm against children and young people are crimes. Intervention that identifies and prevents abuse from occurring is instrumental in supporting children, young people

and families. When abuse has occurred, it is imperative that action is taken to protect children and young people from further experiences of abuse again. We expect our staff and volunteers to know how to define child abuse, to be aware of its indicators and to understand its consequences. The more informed we are, the more effective we will be in our efforts to protect children and young people from all forms of harm and exploitation.

We expect that our staff and volunteers are willing to protect children and young people. When any form of abuse or exploitation has occurred, it is imperative that our staff and volunteers are willing to take action to protect the children and young people from further experiences of harm.

We expect our staff and volunteers not to obstruct or prevent anyone from reporting instances of abuse, harm or exploitation in accordance with our policies and procedures. It is a serious breach of this policy, and possibly the law, if a staff member or volunteer in any way obstructs, prevents or causes the failure of information about the abuse, harm or exploitation of a child or young person being reported according to the policies and procedures of the organisation.

We expect our staff and volunteers to know and follow regulations in relation to the care of children and young people. There are number of regulations governing the provision of child care. These regulations define our minimum responsibilities and obligations towards children, young people and families. We expect all our staff and volunteers to know and follow these regulations. It is the responsibility of the managers of our services to ensure that the regulations are adhered to by all staff and volunteers under their supervision.

We expect our staff and volunteers to know and follow the law in relation to reporting child abuse. We expect our staff and volunteers to know and follow the principles of mandatory reporting, or any other relevant laws in their state jurisdiction, to report child abuse (physical, sexual, emotional), grooming, family violence, neglect and exploitation. Notwithstanding our obligations under the law, we expect our staff and volunteers to consult with a senior person in the organisation to ensure that appropriate action is taken to respond to concerns about the wellbeing or safety of a child or young person.

We expect our staff and volunteers to co-operate with police and/or other formal investigations. In every circumstance, we expect our staff and volunteers to co-operate to the best of their ability with any formal investigation undertaken by the police or other authorised body in relation to the care and protection of children and young people.

We expect our staff and volunteers to use the operational procedures whenever they have a concern that a child may be experiencing abuse, family violence or neglect. This policy has been designed to facilitate decision making in relation to the protection of children and young people. At all times,

we expect our staff and volunteers to have a comprehensive understanding of the contents of this policy and abide by them whenever they have concerns about the possibility that a child or young person has experienced or may be at risk of experiencing abuse, family violence or neglect. Staff and volunteers will understand and implement the organisation's operational procedures whenever there is a potential or actual breach of this policy.

We expect our staff and volunteers not to harm or exploit children and young people who access our services. It is a serious breach of this policy, and possibly the law, if a staff member or volunteer harms or exploits children and young people who are involved in any of our services, access or visit our organisation.

We expect our staff and volunteers not to contravene any policies, regulations or laws in relation to the safety and protection of children and young people. It is a serious breach of this policy, and possibly the law, if a staff member or volunteer contravenes any regulations or laws in relation to the safety and protection of children and young people, whether or not they are working or volunteering at the time.

We expect that our staff and volunteers will support children, young people and their families as directed by senior people in the organisation in the event that a child or young person is abused, bullied or exploited by a staff member, volunteer or other service user. We recognise that the impact of abuse, bullying or exploitation on children and young people is traumatic. It is even more complex when the perpetrator of the abuse or exploitation is another staff member or volunteer. In these situations, we will provide opportunities for formal debriefing and/or counselling to the children, young people and their families who have experienced the abuse, bullying or exploitation, and any other child, young person and family in the community who may be affected indirectly by the incident(s). Breaches of this policy include, but are not limited to, staff and volunteers who

- sexually assault children or young people;
- physically assault children or young people;
- abduct children or young people;
- verbally abuse or bully children or young people;
- sexually harass children or young people;
- take photos of children or young people without their consent or the consent of their guardians;
- publish any material containing images of children or young people that can be used for the sexual gratification of others;
- access, download, store or distribute any form of child pornography.

Section 5. How will we Ensure our Policy is Continually Improved?

The Board of the organisation will review this policy annually (or earlier as required). It will delegate the responsibility

for evaluating the organisation's compliance with this policy to the CEO. The CEO will undertake to collect, analyse and report on relevant data from the organisation that provides an assessment of

- the degree of compliance;
- new or additional risks identified for children and young people and how those risks were addressed;
- critical incidents that have resulted in children and young people experiencing harm, abuse or exploitation arising from their involvement with the organisation; and
- areas for improvement.

The Board will produce an annual report about the outcomes of the information collected in relation to its child protection policy and make it available to parents, staff and volunteers of the organisation and the broader community that we serve.

Conclusion

An organisation's child protection policy is a cornerstone of the quality of its safeguarding culture. It is a complex document to write. It reinforces itself in the way it describes its purpose and intent. This is an important element of its development – to inspire and bind the commitment of its staff and volunteers to acting always in the best interests of children and young people who take part in a programme or activity of the organisation. If constructed with heart and sensitivity, it can shape and define the very narrative about what the organisation stands for in relation to the safety of children and the responsibilities of adults to fulfilling the rights of children and young people more broadly.

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